

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

NOTICE OF DEPOSITION OF DANIEL NINIVAGGI

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure (the “Federal Rules”), Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 7030-1 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC (collectively, “Foxconn”)² will take the deposition upon oral examination of Daniel Ninivaggi on **August 24, 2023, at 12:00 p.m. (ET)**, continuing until completed.

The deposition will take place before a notary public or other person authorized by law to administer oaths. The deposition will take place via videoconference. The deposition will be recorded by stenographic means, and may also be recorded by audio or audiovisual means. The deposition will be taken for all purposes permitted by the Federal Rules, Bankruptcy Rules, Local Rules, and applicable law.

¹ The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “Debtors”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² The term “Foxconn” is limited to those entities named in the Debtors’ adversary complaint that are subject to the jurisdiction of this Court. At the appropriate time and if necessary, Foxconn will seek relief for those entities that are without the Court’s jurisdiction.

Dated: August 23, 2023
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL
LLP**

/s/ Matthew O. Talmo

Robert J. Dehney (No. 3578)
Matthew B. Harvey (No. 5186)
Matthew O. Talmo (No. 6333)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, DE 19899-1347
Telephone: (302) 658-9200
Facsimile: (302) 658-3989
Email: rdehney@morrisnichols.com
mharvey@morrisnichols.com
mtalmo@morrisnichols.com

-and-

PAUL HASTINGS LLP

Matthew M. Murphy
Matthew Micheli
Michael C. Whalen
71 South Wacker Drive Suite 4500
Chicago, IL 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6100
Email: mattmurphy@paulhastings.com
mattmicheli@paulhastings.com
michaelcwhalen@paulhastings.com

-and-

Kevin P. Broughel
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Facsimile: (312) 319-4090
Email: kevinbroughel@paulhastings.com

Counsel to Foxconn